

## EXHIBIT A

Plaintiff: LOUIS CASTAGNA

Plaintiff's injuries: Plaintiff was diagnosed with asbestosis and Asbestos-Related Pleural Disease on or about October 11, 2004. Defendants: Plaintiff contends that the asbestos-containing products to which he was or may have been exposed to were manufactured, supplied, distributed, installed and/or contracted for by Defendants.

Plaintiff's exposure to asbestos occurred at the following times and places, and involved exposure to dust created by the contractors and the products of the entities listed below. The exposure includes, but is not limited, to the following presently known contractors and the manufacturers and distributors of asbestos-containing products:

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Interlake Steamship Company	<u>S.S. HENRY G. DALTON</u> (1916)	Wiper	7/25/1967- 9/21/1967; 10/1/1967- 11/8/1967
		Fireman	9/22/1967- 10/1/1967
	<u>S.S. WALTER E. WATSON</u> (1920)	Wiper	4/9/1968- 4/25/1968; 5/2/1968- 5/27/1968; 10/6/1968- 10/10/1968
		Oiler	5/31/1968- 10/5/1968; 10/14/1968- 10/22/1968
	<u>S.S. WILLIAM P. SNYDER JR.</u> (1906)	Oiler	4/2/1969- 9/23/1969; 7/15/1970- 9/25/1970

Job Duties: Plaintiff was a wiper on board HENRY G. DALTON. Plaintiff performed general maintenance in the engine room. Plaintiff cleaned generators. Plaintiff chipped and scraped asbestos insulated pipes. Plaintiff repaired insulation on pipes using EAGLE-PICHER insulation cement and pipecovering, JOHNS-MANVILLE pipecovering, and PABCO insulation cement. Plaintiff poured the insulation cement into a 55 gallon drum and added water. Plaintiff mixed and handled the insulation with his hands. Plaintiff used ANCHOR PACKING packing for valves, ANCHOR gasket materials, GARLOCK gaskets (cut and fitted), and asbestos welding blankets. Plaintiff recalls the boilers were manufactured by FOSTER WHEELER.

On board WALTER E. WATSON, plaintiff was a fireman. Plaintiff performed routine maintenance, maintained fire boxes in FOSTER WHEELER boilers, cleaned boiler tubes, and repaired boilers. Plaintiff replaced GARLOCK gaskets, replaced valves, and re-packed valve stems. Plaintiff opened and closed manways, steam drums, and mud drums.

As an oiler on board WILLIAM P. SNYDER JR., plaintiff checked gauges and ensured all operating and lubricated, and cleaned filters for water intakes and FOSTER WHEELER boilers. Plaintiff also cleaned heat exchangers, generators, and DELAVAL steam turbines. Plaintiff worked near the following trades: engineers, wipers, firemen, and oilers.

Plaintiff used the same manufacturers' products on board all three ships. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Emerald Mining Co. c/o Diamond Shamrock Corp. 1100 Superior Ave. Cleveland, OH 44114	Emerald Mining Co. Unknown location	Merchant Marine	1967-1970

Job Duties: Plaintiff is currently unable to recall the specifics of this employment. Plaintiff is currently unaware if he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Manpower, Inc. & Domestic Subsidiaries PO Box 1300 Milwaukee, WI 53201	Hammermill Paper Co. Erie, PA	Clerk	10/1968-12/1968

Job Duties: Plaintiff worked in the shipping and receiving room sending out paper orders. Plaintiff would go through the plant and encountered paper line (rollers) area and observed mechanical work being done. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
ARB, Inc. 26000 Commercentre Dr. Lake Forest, CA 92630	Pipeline Grass Valley, CA	Steamfitter (apprentice)	10/22/1969- 11/16/1969

Job Duties: Plaintiff laid pipes and installed FLEXITALLIC gaskets. Plaintiff assisted a welder and handled LINCOLN FLEETWELD 5P welding rods. Plaintiff ground welds with a MILWAUKEE grinder and changed the grinding wheels. Plaintiff recalls working around laborers cleaning and sweeping. Plaintiff recalls supervisor Damon Leaper, address currently unknown. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
San Leandro Equipment Rental, Inc. 4 Greenwich Office Park Greenwich, CT 06831	San Leandro Equipment Rental, Inc., San Leandro, CA	Maintenance Mechanic	1/1970-3/1970

Job Duties: Plaintiff replaced exhaust gaskets on BRIGGS & STRATTON gasoline motors in lawnmowers. Plaintiff maintained and repaired lawnmowers, gardening equipment, and cement mixers. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Lyles Diversified, Inc. PO Box 4376 Fresno, CA 93744	Pipeline 3 <sup>rd</sup> Street and Addison Street, Berkeley, CA	Steamfitter (apprentice)	4/1/1970-6/1970

Job Duties: Plaintiff laid underground pipes and installed FLEXITALLIC gaskets. Plaintiff assisted welders and handled LINCOLN FLEETWELD 5P welding rods and asbestos welding blankets. Plaintiff ground welds with a MILWAUKEE grinder and changed grinding wheels. Plaintiff recalls working around laborers cleaning and sweeping. Plaintiff recalls supervisor Damon Leaper, address currently unknown. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Schwartz & Schwartz Jensens Furniture 18050 Hesperian Blvd. San Lorenzo, CA 94580	Jensens Furniture 18050 Hesperian Blvd. San Lorenzo, CA	Deliveryman	10/1970-3/1971

Job Duties: Plaintiff set up displays and delivered furniture. Plaintiff replaced tiles with ARMSTRONG linoleum tiles in the apartments' laundry rooms. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
U.S. Steel	<u>GOVERNOR MILLER</u> (1938)	Oiler	6/30/1971- 11/3/1971

Job Duties: Plaintiff checked gauges and cleaned filters for water intakes and FOSTER WHEELER boilers. Plaintiff also cleaned heat exchangers, generators, and DELAVAL steam turbines. Plaintiff chipped and scraped asbestos insulated pipes. Plaintiff repaired insulation on pipes using EAGLE-PICHER insulation cement and pipecovering, JOHNS-MANVILLE pipecovering, and PABCO insulation cement. Plaintiff poured the insulation cement into a 55 gallon drum and added water. Plaintiff mixed and handled the insulation with his hands. Plaintiff used ANCHOR PACKING packing for valves, ANCHOR gasket materials, GARLOCK gaskets (cut and fitted), and asbestos welding blankets. Plaintiff worked near the following trades: engineers, wipers, firemen, and oilers. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Westward Ho Junior Hotel Co., Inc. Hotel Valley Ho 6850 Main St. Scottsdale, AZ 85008 3838 E. Van Buren Phoenix, AZ 85008	Hotel Valley Ho Scottsdale, AZ	Maintenance Mechanic	10/1971-12/1971

Job Duties: Plaintiff maintained refrigeration units and inspected gauges.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Ramada, Inc. c/o Marriott Corp., 1 Marriott Dr. Washington, DC 20058-0001	Ramada Inn Scottsdale, AZ	Maintenance Mechanic	1/1972-3/1972

Job Duties: Plaintiff maintained refrigeration units and inspected gauges.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
U.S. Steel	<u>ARTHUR M. ANDERSON</u> (1952)	Oiler	4/12/1972- 5/4/1975; 5/5/1972- 5/31/1972

Job Duties: Plaintiff checked gauges and cleaned filters for water intakes and FOSTER WHEELER boilers. Plaintiff also cleaned heat exchangers, generators, and DELAVAL and GENERAL ELECTRIC steam turbines. Plaintiff chipped and scraped asbestos insulated pipes. Plaintiff repaired insulation on pipes using EAGLE-PICHER insulation cement and pipecovering, JOHNS-MANVILLE pipecovering, and PABCO insulation cement. Plaintiff poured the insulation cement into a 55 gallon drum and added water. Plaintiff mixed and handled the insulation with his hands. Plaintiff used ANCHOR PACKING packing for valves, ANCHOR gasket materials, GARLOCK gaskets (cut and fitted), and asbestos welding blankets. Plaintiff worked near the following trades: engineers, wipers, firemen, and oilers. Plaintiff currently contends that he was exposed to asbestos during this employment.

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<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Commander Military Sealift Com. Pac. Naval Submarine Base Military Sealift Com. Pac. Code N84 140 Sylvester Road, N84 San Diego, CA 92106	<u>TALUGA</u> (AO-62)	Oiler	1972-1973

Triple A Machine Shop  
(Pier 64)  
San Francisco, CA

Job Duties: Plaintiff checked gauges and cleaned filters for water intakes and FOSTER WHEELER boilers. Plaintiff also cleaned heat exchangers, generators, and DELAVAL steam turbines. Plaintiff chipped and scraped asbestos insulated pipes. Plaintiff repaired insulation on pipes using EAGLE-PICHER insulation cement and pipecovering, JOHNS-MANVILLE pipecovering, and PABCO insulation cement. Plaintiff poured the insulation cement into a 55 gallon drum and added water. Plaintiff mixed and handled the insulation with his hands. Plaintiff used ANCHOR PACKING packing for valves, ANCHOR gasket materials, GARLOCK gaskets (cut and fitted), and asbestos welding blankets. Plaintiff fueled other ships. Plaintiff worked near the following trades: engineers, wipers, firemen, and oilers. Plaintiff lived on board while repairs were being done at Triple A.. Plaintiff recalls working near the following trades working for TRIPLE A: machinists, mechanics, and welders. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
HECLA Mining Co. 6500 N. Mineral Dr. Coeur D'Alene, ID 83815	HECLA Mining Co. Casa Grande, AZ	Miner	1/1973-3/1973

Job Duties: Plaintiff mined for copper.

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<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Kinsman Marine Transit Co. Bond Court Bldg.-Suite 911 Cleveland, OH 44114	<u>THOMAS WILSON</u> (1943)	Oiler	4/11/1973- 8/3/1973; 8/7/1973- 9/1/1973; 9/17/1973- 12/14/1973

Job Duties: Plaintiff checked gauges and cleaned filters for water intakes and FOSTER WHEELER boilers. Plaintiff also cleaned heat exchangers, generators, and DELAVAL steam turbines. Plaintiff chipped and scraped asbestos insulated pipes. Plaintiff repaired insulation on pipes using EAGLE-PICHER insulation cement and pipecovering, JOHNS-MANVILLE pipecovering, and PABCO insulation cement. Plaintiff poured the insulation cement into a 55 gallon drum and added water. Plaintiff mixed and handled the insulation with his hands. Plaintiff used ANCHOR PACKING packing for valves, ANCHOR gasket materials, GARLOCK gaskets (cut and fitted), and asbestos welding blankets. Plaintiff worked near the following trades: engineers, wipers, firemen, and oilers. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Conagra Grocery Products Co., c/o Eric Johnson One Conagra Dr.-CC 240 Omaha, NE 68102	Conagra Grocery Products Co., Unknown location	Unknown	7/1974-12/1974

Job Duties: Plaintiff is currently unable to recall the specifics of this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
John Fontanot J & L Trucking 26712 Wauchula Way Hayward, CA 94545	J & L Trucking Shop Hayward, CA	Mechanic	10/1974-12/1974

Job Duties: Plaintiff replaced brake linings for semi-trailers and vans manufactured by TRAILMOBILE, KENWORTH, and PETERBILT. Plaintiff also worked on the brake linings of WHITE Frieghtliners. Plaintiff sanded brakes. Plaintiff drilled into brake linings to rivet them

to the steel holders. Plaintiff used BENDIX brakes. Plaintiff worked around other mechanics performing the same duties, including engine work and overhauls on WHITE, CATERPILLAR, and PETERBILT vehicles. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
MGM Construction Co., Inc. c/o Bonnie Hold 45 Winding Glen Alamo, CA 94507	Phillips Petroleum Avon, CA	Steamfitter	11/21/1974- 3/1975

Job Duties: Plaintiff cut, fitted, and laid AMERON asbestos cement pipes and JOHNS-MANVILLE Transite pipes outside. Plaintiff used an abrasive gas cutter to cut the asbestos cement and Transite pipe. Plaintiff worked near laborers digging trenches and operating engineers operating cranes to lay down pipes. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Conagra Grocery Products Co., c/o Eric Johnson One Conagra Dr.-CC 240 Omaha, NE 68102	Conagra Grocery Products Co., Unknown location	Unknown	4/1975-6/1975

Job Duties: Plaintiff is currently unable to recall the specifics of this employment. Plaintiff is currently unaware if he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
C. F. Braun & Co. 1000 S. Fremont Ave. Alhambra, CA 91802	Standard Oil Richmond, CA	Steamfitter	6/30/1975-7/1975

Job Duties: Plaintiff recalls this was new construction at the refinery. Plaintiff cut carbon steel pipes. Plaintiff welded with LINCOLN FLEETWELD 5P welding rods. Plaintiff installed GARLOCK and FLEXITALLIC gaskets, valves, and pumps. Plaintiff worked around the following trades: electricians, laborers, carpenters, boilermakers working on heat exchangers and boilers, steamfitters, pipefitters, and cement finishers. Plaintiff recalls SCOTT CO. employees



working on the new construction. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Brocon, Inc. Three Greenway Plaza Houston, TX 77046	Shell Oil Martinez, CA	Steamfitter	7/1975-12/1975

Job Duties: Plaintiff laid pipes for units, heat exchangers, and crackers. Plaintiff installed FLEXITALLIC and GARLOCK gaskets, and valves. Plaintiff welded with LINCOLN FLEETWELD 5P welding rods. Plaintiff worked near the following trades: electricians, laborers cleaning and sweeping, millwrights, operating engineers, ironworkers, carpenters building scaffolds that disturbed insulated pipes. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Ehrhart & Associates	Standard Oil Richmond, CA	Steamfitter	7/14/1975- 12//1975

Job Duties: Plaintiff cut and prepped pipes for a new unit. Plaintiff welded with LINCOLN FLEETWELD 5P welding rods and ground the welds. Plaintiff installed valves and FLEXITALLIC gaskets. Plaintiff recalls working with the following trades nearby: electricians, laborers, millwrights, ironworkers, insulators, and operating engineers. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Pacific Mechanical Corp. Box 4041 Concord, CA 94524	Standard Oil Richmond, CA	Steamfitter	12/2/1975- 1/18/1976

Job Duties: Plaintiff performed tie-ins. Plaintiff removed existing insulation from the pipes, removed the sections of damaged pipes, and replaced them. Plaintiff replaced valves with GLOBE and LUNKENHEIMER valves; gaskets with FLEXITALLIC and GARLOCK gaskets; pumps; and packing. Plaintiff worked around insulators repairing insulation, welders welding with LINCOLN FLEETWELD 5P welding rods, laborers cleaning and sweeping, electricians, instrumentalists, and millwrights re-aligning couplings. Plaintiff recalls supervisor Gene Yates,

address currently unknown. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
C.F. Braun	Standard Oil Richmond, CA	Steamfitter	1/19/1976

Job Duties: Plaintiff recalls working on a unit. Plaintiff installed FLEXITALLIC and GARLOCK gaskets for the pipes. Plaintiff installed valves and tightened packing. Plaintiff installed new pipes that were connected to the furnaces. Plaintiff worked around CONTRA COSTA ELECTRIC electricians who were cutting and routing electrical wires, and installing panels and breakers. Plaintiff recalls SCOTT CO. employees performed instrumentation work in the unit. Plaintiff worked around the following trades: boilermakers working on the furnaces and pressure vessels, carpenters, electricians, laborers, and operating engineers. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Bechtel, Inc. 50 Beale St. San Francisco, CA 94105	Phillips Petroleum Avon, CA	Steamfitter	1/20/1976- 3/30/1976

Job Duties: Plaintiff recalls the coker and catcracker was burned out. Plaintiff performed flange work to isolate for demolition and repairs. Plaintiff demolished pipes, BABCOCK & WILCOX boilers, cokers, catcrackers, and heat exchangers. Plaintiff used asbestos blankets when torching. Plaintiff installed CRANE CO. valves, FLEXITALLIC and GARLOCK gaskets, and packing. Plaintiff recalls working with the following trades: electricians, welders, carpenters, operating engineers, boilermakers, steamfitters, pipefitters, and laborers. Plaintiff recalls drywallers using NATIONAL GYPSUM sheetrock, and GOLD BOND joint compound and wall texture. Plaintiff recalls general foreman Dick Dole, address currently unknown; and supervisor Vern Gosney, c/o Paul, Hanley & Harley. Plaintiff currently contends that he was exposed to asbestos during this employment.

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<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Albay Construction Co. 865 Howe Rd. Martinez, CA 94553	Standard Oil Richmond, CA	Steamfitter	3/31/1976-6/1976

Job Duties: Plaintiff recalls this was a shutdown for repairs. Plaintiff removed and replaced insulation on sections of pipes in order to perform tie-ins. Plaintiff welded with LINCOLN 5P welding rods and used asbestos blankets. Plaintiff replaced pumps; packing; valves with GATES, GLOBE, POWELL, CRANE CO., and LUNKENHEIMER valves (i.e. process, air control, and steam valves); and gaskets with FLEXITALLIC and GARLOCK gaskets. Plaintiff recalls the following trades working near him: boilermakers working on FOSTER WHEELER boilers and BABCOCK & WILCOX boilers and heat exchangers; carpenters; electricians; welders; millwrights; and pipefitters working on DELAVAL turbines. Plaintiff also recalls BABCOCK & WILCOX boilermakers repairing boilers and heat exchangers and their apparatuses; PACIFIC MECHANICAL CORPORATION pipefitters performing the same duties that he did, boilermakers, and carpenters; PERFORMANCE MECHANICAL INC pipefitters performing the same duties that he did, boilermakers, and carpenters; and JOHNSON CONTROLS electricians and instrument workers using control valves and controls for steam, oil, and other products to flow in pipes. Plaintiff recalls co-worker James Saathoff, c/o Brayton♦Purcell LLP. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Foley-PMI Inc. 5440 Cherokee Ave. Alexandria, VA 22312	Foley-PMI Inc. Unknown location	Steamfitter	7/1976-12/1976

Job Duties: Plaintiff is currently unable to recall the specifics of this employment.

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<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Amtech Lighting Services Co. 2390 E. Orangewood Ave., #100 Anaheim, CA 92806	Amtech Lighting Services Co., Unknown location	Steamfitter	10/1976-12/1976

Job Duties: Plaintiff is currently unable to recall the specifics of this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Industrial Maintenance Corp. 11933 Wilshire Blvd. Los Angeles, CA	Union Oil Rodeo/Oleum, CA	Steamfitter	3/7/1977- 3/31/1977

Job Duties: Plaintiff performed shutdown and repair work. In the main unit, plaintiff replaced pumps with CHICAGO pumps; packing; valves with LUNKENHEIMER and CRANE CO. valves; steam pipelines; and product lines. Plaintiff removed insulation around the bolts and pipes when performing tie-ins. Plaintiff welded with LINCOLN 5P welding rods and used asbestos blankets. Plaintiff recalls the following trades working on or around the coker: carpenters building scaffolds, electricians working on control panels, and boilermakers working on the main vessel. Plaintiff recalls co-worker Ed Witson, deceased. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Albay Construction Co. 865 Howe Rd. Martinez, CA 94553	Shell Oil Martinez, CA	Steamfitter	4/11/1977-6/1977

Job Duties: Plaintiff recalls this was a major shutdown and repair work. Plaintiff recalls the units were constructed in the 1950's and 1960's. Plaintiff worked on product pipes and steam pipes related to the crackers. Plaintiff replaced pumps; valves; gaskets with FLEXITALLIC and GARLOCK gaskets; and packing with JOHN CRANE packing. Plaintiff welded with LINCOLN 5P welding rods and used asbestos blankets. Plaintiff was near BABCOCK & WILCOX boilermakers working on heat exchangers, furnaces, and boilers. Plaintiff recalls

PLANT INSULATION insulators removing and reapplying insulation on pipelines. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Bechtel Power Corp. 50 Beale St. San Francisco, CA 94105	St. Johns Power Plant St. Johns, AZ	Steamfitter	7/1977-1979 (4-5 months)

Job Duties: At St. Johns, plaintiff was in the main building working on the coal slurry pipelines. Plaintiff recalls this was new construction. Plaintiff installed CRANE CO. valves, and GARLOCK and FLEXITALLIC gaskets. Plaintiff was around boilermakers closing the manways with gaskets and using boiler jackets. Plaintiff was near refractory workers laying refractory materials and bricks and mixing the refractory materials for the boilers and two fireboxes. Plaintiff was around insulators insulating steamlines and other pipelines. Plaintiff was also around the following trades: carpenters building scaffolds; laborers cleaning and sweeping; electricians running electrical lines and panel work and switch gears for pumps and lights; and millwrights installing pumps. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Bechtel Power Corp. 50 Beale St. San Francisco, CA 94105	Arizona Public Service Co. Cholla Powerhouse Route 66 Winslow, AZ	Steamfitter	7/1977-1979 (3-4 months)

Job Duties: Plaintiff recalls this was new construction. Plaintiff welded the main steamlines to tie into the turbines. Plaintiff installed GATES and LUNKENHEIMER valves. Plaintiff performed flange work with GARLOCK and FLEXITALLIC gaskets. Plaintiff was around others building the turbines. Plaintiff worked near the following trades: millwrights setting and lining pumps, laborers, painters, electricians, boilermakers constructing boilers, and refractory bricklayers installing refractory materials and bricks. Plaintiff currently contends that he was exposed to asbestos during this employment.

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<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Bechtel Power Corp. 50 Beale St. San Francisco, CA 94105	AEC-Hanford Richland, WA	Steamfitter	7/1977-1979 (4-5 months)

Job Duties: Plaintiff recalls this was new construction of the Fast Flux Test area. Plaintiff installed pipelines with LUNKENHEIMER, GATES, and NIBCO valves; GARLOCK and FLEXITALLIC gaskets; and bolts. Plaintiff handled LINCOLN 5P welding rods and assisted welders. Plaintiff used asbestos blankets. Plaintiff recalls the following trades: electricians, laborers, boilermakers building heat exchangers, millwrights, and refractory workers. Plaintiff recalls steamfitter Frenchie Goodin, deceased. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Bechtel Power Corp. 50 Beale St. San Francisco, CA 94105	AEC-Hanford Richland, WA	Steamfitter	7/1977-1979 (8-9 months)

Job Duties: Plaintiff worked at the nuclear reservation area. Plaintiff recalls this was new construction. Plaintiff installed pipelines and systems. Plaintiff used gaskets and valves. Plaintiff tightened packing. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Bechtel Power Corp. 50 Beale St. San Francisco, CA 94105	Boise Cascade Pulp Mill Wallula, WA	Steamfitter	7/1977-1979 (3-4 months)

Job Duties: Plaintiff recalls this was a remodel and expansion job. Plaintiff performed tie-ins and removed insulation on the flange areas. Plaintiff installed pipes on the machines and replaced gaskets with FLEXITALLIC and GARLOCK gaskets. Plaintiff was around a welder welding with LINCOLN 5P welding rods and using asbestos welding blankets. Plaintiff replaced valves and tightened the packing in the valves. Plaintiff recalls the following trades: millwrights replacing pumps, electricians, laborers, and JOHNSON CONTROLS employees working on control panels. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
J. A. Jones, Inc. 6000 Fairview Rd. #614 Charlotte, NV 28210	AEC-Hanford Richland, WA	Steamfitter	1978-1980 (on/off: 1 year total)

Job Duties: Plaintiff worked in laboratories that were built in the 1920's or 1930's. Plaintiff worked on the pipe systems, replaced and extended pipes, performed tie-ins to existing insulated pipes, and removed insulation. Plaintiff welded with LINCOLN 5P welding rods. Plaintiff worked up in the attic where there were transite walls and floor. Plaintiff was required to cut into the transite floor so the pipelines would go through. Plaintiff also worked in the Hundred North area. Plaintiff was in the operating nuclear reactor generation station that was shutdown. Plaintiff replaced valves and gaskets on the pipes. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Vengelen & Vincent Co., Inc. 2020 S.E. Bush St. Box 42183 Portland, OR 97242	Vengelen & Vincent Co., Inc., Unknown location	Steamfitter	1978

Job Duties: Plaintiff is currently unable to recall the specifics of this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Oregon Machine Erectors, Inc. Rt. 1, Box 153A Scio, OR 97374	Boise Cascade Corporation Wallawalla, WA	Steamfitter	1978 (2-3 months)

Job Duties: Plaintiff replaced gaskets and performed general pipefitting work. Plaintiff replaced valves. Plaintiff welded pipe supports with LINCOLN 5P welding rods. Plaintiff recalls the following trades: laborers cleaning and assisting, and electricians working with electrical wires for lighting and panels. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Lloyd W. Aubry Co., Inc. 2148 Dunn Rd. Hayward, CA 94545	Carnation Food Plant Moses Lake, WA	Steamfitter	1978-1979

Job Duties: Plaintiff installed a main gas header for a french fry dryer. Plaintiff used GARLOCK and FLEXITALLIC gaskets. Plaintiff assisted a welder and handled LINCOLN FLEETWELD 5P. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Johnson Controls, Inc. c/o Corp. Payroll Box 591 Milwaukee, WI 53201	Northern Pacific Paper Company, Longview, WA	Steamfitter	1979 (about 1 month)

Job Duties: Plaintiff recalls this was a remodeling and expansion job. Plaintiff installed new control valves, and GARLOCK and FLEXITALLIC gaskets. Plaintiff worked with a welder and handled LINCOLN 5P welding rods. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Rust WSH c/o Wheelabrator-Frye, Inc. Liberty Lane Hampton, NH 03842	Boise Cascade Corporation Wallawalla, WA	Steamfitter	2/22/1979- 3/20/1979

Job Duties: Plaintiff is currently unable to recall the specifics of this employment.

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<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Wright Schuchart Harbor Boecon General Energy Resources, Inc. WSH Boecon Geri WBG Box 3764 Seattle, WA 98124	Wright Schuchart Harbor Boecon General Energy Resources, Inc., Unknown location in Hanford, WA	Steamfitter	1979

Job Duties: Plaintiff is currently unable to recall the specifics of this employment. Plaintiff is currently unaware if he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Ditzler Mechanical Contractors Box 885 Albany, OR 97321	Ditzler Mechanical Contractors, Unknown location	Steamfitter	1979

Job Duties: Plaintiff is currently unable to recall the specifics of this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Fred J. Early Jr., Co., Inc. c/o Blount International Ltd. Box 949 Montgomery, AL 36101	Chevron Refinery Richmond, CA	Steamfitter	1979

Job Duties: Plaintiff is currently unable to recall the specifics of this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Wisner & Becker Contracting Engineers 1001 Bayhill Dr.	Wisner & Becker Contracting Engineers, Unknown location	Steamfitter	1979

San Bruno, CA 94066

Job Duties: Plaintiff is currently unable to recall the specifics of this employment. Plaintiff is currently unaware if he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Foley-PMI Inc. 5440 Cherokee Ave. Alexandria, VA 22312	Dow Chemical Pittsburg, CA	Pipefitter	8/27/1979- 12/1979

Job Duties: Plaintiff worked on the new fertilizer plant. Plaintiff used GARLOCK and FLEXITALLIC gaskets. Plaintiff was around other pipefitters installing pipes and laborers cleaning and sweeping. Plaintiff recalls co-worker James Saathoff, c/o Brayton❖Purcell LLP. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
All Technical Engineering & Construction, Inc. Altec Box 867 El Sobrante, CA 94803	Urich Oil Martinez, CA	Steamfitter	8/12/1980- 9/28/1980

Job Duties: Plaintiff assisted a welder and handled LINCOLN 5P welding rods. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Albay Construction Co. 865 Howe Rd. Martinez, CA 94553	DuPont Chemical Plant Oakley, CA	Steamfitter	9/29/1980- 4/26/1981

Job Duties: Plaintiff assisted a welder and handled LINCOLN 5P welding rods. Plaintiff disturbed insulated pipelines by walking and kneeling in the pipeway when working on other pipes. Plaintiff fabricated pipes near other trades. Plaintiff recalls co-worker Bob Fureman, address currently unknown. Plaintiff currently contends that he was exposed to asbestos during this employment.

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<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Fred J. Early Jr., Co., Inc. c/o Blount International Ltd. Box 949 Montgomery, AL 36101	Modules - Alaska Oakland, CA	Steamfitter	4/27/1981- 6/28/1981

Job Duties: Plaintiff fabricated and installed pipes. Plaintiff performed bolt up flange work with FLEXITALLIC and GARLOCK gaskets. Plaintiff assisted a welder and handled LINCOLN 5P welding rods. Plaintiff worked around laborers, electricians, carpenters, ironworkers, and welders. Plaintiff recalls welder Mike Verramonte, address currently unknown. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Aladdin Heating Corp. 2300 W. Olympic Blvd. Los Angeles, CA 90006	General Motors Fremont, CA	Steamfitter	6/29/1981- 7/3/1981

Job Duties: Plaintiff replaced pipes and control valves. Plaintiff performed flange work with gaskets. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
R. L. Bunch Co. 1419 Plaza Del Amo Torrance, CA 90501	General Motors Fremont, CA	Steamfitter	7/4/1981- 9/14/1981

Job Duties: Plaintiff recalls this was an expansion. Plaintiff installed new pipelines for the dipping tank. Plaintiff used GARLOCK and FLEXITALLIC gaskets. Plaintiff installed new valves. Plaintiff assisted a welder and handled LINCOLN 5P welding rods. Plaintiff worked around millwrights lining pumps and machines. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Scott Co. Industrial Contractors	General Motors Fremont, CA	Steamfitter	9/15/1981- 9/30/1981

1919 Market St.  
Oakland, CA 94607

Job Duties: Plaintiff recalls this was an expansion. Plaintiff is currently unaware if he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Chicago Bridge & Iron Co. 1501 N. Division Plainfield, IL 60544	Shell Oil Martinez, CA	Steamfitter	10/1/1981- 12/14/1981

Job Duties: Plaintiff performed tie-ins from the new flexicoker plant to the old plant. Plaintiff worked on pipe racks and jet fuel lines. Plaintiff assisted a welder and handled LINCOLN 5P welding rods. Plaintiff used FLEXITALLIC and GARLOCK gaskets. Plaintiff performed bolt up work above the flexicoker and installed new valves. Plaintiff recalls C.F. BRAUN was the general contractor responsible for the flexicoker plant. Plaintiff recalls the following trades working in the flexicoker plant: electricians, laborers, ironworkers, carpenters, and TIMEC employees. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Lilja Mechanical Construction, Inc. 190 Montair Dr. Danville, CA 94526	Glass Container Antioch, CA	Steamfitter	12/15/1981- 1/4/1982

Job Duties: Plaintiff recalls this was a remodeling and refurbishing job. Plaintiff pulled off insulation and removed pipes. Plaintiff used FLEXITALLIC and GARLOCK gaskets. Plaintiff assisted a welder and handled LINCOLN 5P welding rods. Plaintiff installed pipes to the pumps and valves. Plaintiff repaired and replaced pumps and valves. Plaintiff re-packed valves with ANCHOR PACKING. Plaintiff worked around insulators removing and installing insulation, pipefitters, and millwrights. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Boecon Corp. Box 3707 M S 9C 56 Seattle, WA 98124	Modules - Alaska Richmond, CA	Steamfitter	1/5/1982- 1/25/1982

Job Duties: Plaintiff installed pipes, valves, and FLEXITALLIC and GARLOCK gaskets on the modules. Plaintiff assisted a welder and handled LINCOLN 5P welding rods. Plaintiff worked around the following trades: carpenters, sheetmetal workers, electricians, millwrights, and welders. Plaintiff recalls working near JOHNSON CONTROLS employees installing control valves, tubes, and control panels as well as performing welding and bracket work. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Parsons Constructors, Inc. c/o Parson Services Co. 16055 Space Center Blvd., #725 Houston, TX 77062	Shell Oil Martinez, CA	Steamfitter	1/26/1982- 2/8/1982

Job Duties: Plaintiff performed tie-ins and pipe rack work from the new flexicoker plant to the old plant. Plaintiff replaced and repaired steam traps. Plaintiff used FLEXITALLIC and GARLOCK gaskets. Plaintiff assisted a welder and handled LINCOLN 5P welding rods. Plaintiff recalls CHICAGO BRIDGE & IRON was responsible for the major pipelines and units (i.e. towers and gasfires) and C.F. BRAUN was the general contractor that hired electricians, laborers, ironworkers, carpenters, and insulators. Plaintiff also worked around TIMEC employees and PLANT INSULATION insulators removing and repairing existing insulated pipes. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Chicago Bridge & Iron Co. 1501 N. Division Plainfield, IL 60544	Shell Oil Martinez, CA	Steamfitter	2/9/1982- 3/21/1982

Job Duties: Plaintiff performed heavy rigging and installed pipes and valves in the new flexicoker plant. Plaintiff assisted a welder and handled LINCOLN 5P welding rods. Plaintiff used FLEXITALLIC and GARLOCK gaskets. Plaintiff recalls C.F. BRAUN was the general contractor on the flexicoker plant that hired electricians, laborers, ironworkers, carpenters, and insulators. Plaintiff worked around TIMEC employees. Plaintiff currently contends that he was exposed to asbestos during this employment.

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<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Matthews McCracken & Rutland Corp. Box 3536 Baton Rouge, LA 70821	Modules - Alaska Richmond, CA	Steamfitter	3/22/1982- 3/28/1982

Job Duties: Plaintiff installed pipes, valves, and gaskets on the modules. Plaintiff used FLEXITALLIC and GARLOCK gaskets. Plaintiff assisted a welder and handled LINCOLN 5P welding rods. Plaintiff recalls the following trades working near him: carpenters, sheetmetal workers, electricians, millwrights, and welders. Plaintiff was around JOHNSON CONTROLS and BOECON employees installing control valves, tubes, and control panels as well as performing welding and bracket work. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Dillingham Corp. 1350 Tita Blvd., #340 Walnut Creek, CA 94596	Modules - Alaska Oakland, CA	Steamfitter	3/29/1982- 5/18/1982

Job Duties: Plaintiff replaced with FLEXITALLIC and GARLOCK gaskets for pressure testing lines. Plaintiff assisted a welder and handled LINCOLN 5P welding rods. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Peter Kiewit Sons Co. 1400 Kiewit Plaza Omaha, NE 68131	Modules - Alaska Alameda, CA	Steamfitter	5/19/1982- 7/13/1982

Job Duties: Plaintiff assisted welders and handled LINCOLN 5P welding rods. Plaintiff ground welds and re-did some welds. Plaintiff installed pipes, valves, and gaskets on the modules. Plaintiff used FLEXITALLIC and GARLOCK gaskets. Plaintiff recalls the following trades working near him: carpenters, sheetmetal workers, electricians, millwrights, and welders. Plaintiff currently contends that he was exposed to asbestos during this employment.

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<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Henry J. Kaiser Co. c/o Automatic Data Processing 12303 Airport Way, #125 Broomfield, CO 80021	Standard Oil Richmond, CA	Steamfitter	7/14/1982- 10/24/1982

Job Duties: Plaintiff replaced FLEXITALLIC gaskets for pipes. Plaintiff worked with a welder and handled LINCOLN 5P welding rods. Plaintiff worked near laborers cleaning and sweeping after him, and electricians replacing electrical panels and wires. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Morrison Knudsen Co., Inc. Box 7808 Boise, ID 83729	Modules - Alaska Richmond, CA	Steamfitter	10/25/1982- 12/28/1982

Job Duties: Plaintiff installed pipes, valves, and gaskets on the modules. Plaintiff used FLEXITALLIC and GARLOCK gaskets. Plaintiff assisted a welder and handled LINCOLN 5P welding rods. Plaintiff worked with the following trades: carpenters, sheetmetal workers, electricians, millwrights, and welders. Plaintiff worked near JOHNSON CONTROLS employees installing control valves, tubes, and control panels as well as performing welding and bracket work. Plaintiff was in close proximity to SCOTT CO. employees working. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Stanford W. & Barbara M. Blodgett Stanford W. Blodgett Blodgett Construction 15870 Edmund Dr. Los Gatos, CA 95030	Glass Container Antioch, CA	Steamfitter	12/29/1982- 12/31/1982

Job Duties: During a shutdown, plaintiff repaired and replaced parts of the pipe systems. Plaintiff installed spools, which consisted of pipe fittings, flanges, and FLEXITALLIC and

GARLOCK gaskets, for steam and gas. Plaintiff removed valves and installed new ones. Plaintiff assisted welders and handled LINCOLN 5P welding rods. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Davy McKee Constructors, Inc. 300 S. Riverside Plaza Chicago, IL 60606	Davy McKee Constructors, Inc., Unknown location	Steamfitter	1983

Job Duties: Plaintiff is currently unable to recall the specifics of this employment. Plaintiff is currently unaware if he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Pacific Mechanical Corp.	Monsanto Chemical Avon, CA	Steamfitter	2/8/1983-3/7/1983

Job Duties: During a shutdown, plaintiff replaced insulated lines and installed new lines. Plaintiff used GARLOCK and FLEXITALLIC gaskets. Plaintiff assisted a welder and handled LINCOLN 5P welding rods. Plaintiff replaced valves and pumps for the first flanges. Plaintiff worked near the following trades: carpenters, electricians pulling wires and putting in new conduits, insulators removing and replacing insulation, millwrights replacing pumps, and ironworkers performing structure and welding work. Plaintiff recalls co-worker Charlie House, address currently unknown. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Morrison Knudsen Co., Inc. Box 7808 Boise, ID 83729	Modules - Alaska Richmond, CA	Steamfitter	3/8/1983- 3/30/1983

Job Duties: Plaintiff installed pipes, valves, and FLEXITALLIC and GARLOCK gaskets on the modules. Plaintiff assisted a welder and handled LINCOLN 5P welding rods. Plaintiff worked near the following trades: carpenters, sheetmetal workers, electricians, millwrights, and welders. Plaintiff was around JOHNSON CONTROLS employees working on control valves, tubes, and control panels as well as performing welding and bracket work. Plaintiff recalls SCOTT CO. employees. Plaintiff recalls co-worker James Saathoff, c/o Brayton❖Purcell LLP; Ed Russell,



address currently unknown; and Vern Gosney, c/o Paul, Hanley & Harley. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Kiewit-Southern LPS No. 2 Box 31096 Omaha, NE 68131	Modules - Alaska Alameda, CA	Steamfitter	3/31/1983- 4/15/1983

Job Duties: Plaintiff assisted welders and handled LINCOLN 5P welding rods. Plaintiff ground welds and re-did the welds. Plaintiff used FLEXITALLIC and GARLOCK gaskets. Plaintiff installed pipes, valves, and gaskets on the modules. Plaintiff recalls the following trades: carpenters, sheetmetal workers, electricians, millwrights, and welders. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Pacific Mechanical Corp.	Tosco Oil Avon, CA	Steamfitter	4/16/1983- 5/8/1983

Job Duties: Plaintiff repaired a catcracker that was burned out. Plaintiff demolished pipelines, beams, and the catcracker. Plaintiff chipped fireproofing off of beams. Plaintiff worked near the following trades: boilermakers, laborers, carpenters, electricians, pipefitters, and steamfitters. Plaintiff recalls the following contractors were part of the demolition and performed the same duties he did: SWINERTON & WALBERG, EPIC INSTRUMENTS, FOSTER WHEELER, DILLINGHAM demolished the heat exchangers and furnaces, PERFORMANCE MECHANICAL (PMI), BAUGH, BECHTEL, and ALBAY CONSTRUCTION. Plaintiff recalls co-worker James Saathoff, c/o Brayton♦Purcell LLP Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Hollinger Engineering	Union Chemical Rodeo, CA	Steamfitter	5/9/1983- 5/10/1983

Job Duties: Plaintiff recalls this was a repair job.

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<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Pacific Mechanical Corp.	Tosco Oil Avon, CA	Steamfitter	5/11/1983- 5/23/1983; 5/24/1983- 5/31/1983

Job Duties: Plaintiff repaired a catcracker that was burned out. Plaintiff demolished pipelines, beams, and the catcracker. Plaintiff chipped fireproofing off of beams. Plaintiff worked near the following trades: boilermakers, laborers, carpenters, electricians, pipefitters, and steamfitters. Plaintiff recalls the following contractors were part of the demolition and performed the same duties he did: SWINERTON & WALBERG, EPIC INSTRUMENTS, FOSTER WHEELER, DILLINGHAM demolished the heat exchangers and furnaces, PERFORMANCE MECHANICAL (PMI), BAUGH, BECHTEL, and ALBAY CONSTRUCTION. Plaintiff recalls co-worker James Saathoff, c/o Brayton♦Purcell LLP Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Swinerton Builders 1 Kaiser Plaza, #701 Oakland, CA 94612	Tosco Oil Avon, CA	Steamfitter	6/1/1983- 6/8/1983

Job Duties: Plaintiff repaired a catcracker that was burned out. Plaintiff demolished pipelines, beams, and the catcracker. Plaintiff chipped fireproofing off of beams. Plaintiff worked near the following trades: boilermakers, laborers, carpenters, electricians, pipefitters, and steamfitters. Plaintiff recalls the following contractors were part of the demolition and performed the same duties he did: SWINERTON & WALBERG, EPIC INSTRUMENTS, FOSTER WHEELER, DILLINGHAM demolished the heat exchangers and furnaces, PERFORMANCE MECHANICAL (PMI), BAUGH, BECHTEL, and ALBAY CONSTRUCTION. Plaintiff recalls co-worker James Saathoff, c/o Brayton♦Purcell LLP Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Epic Instruments, Inc. 310 N. Winter 291 Heron Ave. Naples, FL 34108	Tosco Oil Avon, CA	Steamfitter	6/9/1983- 7/26/1983

Job Duties: Plaintiff repaired a catcracker that was burned out. Plaintiff demolished pipelines, beams, and the catcracker. Plaintiff chipped fireproofing off of beams. Plaintiff worked near the following trades: boilermakers, laborers, carpenters, electricians, pipefitters, and steamfitters. Plaintiff recalls the following contractors were part of the demolition and performed the same duties he did: SWINERTON & WALBERG, EPIC INSTRUMENTS, FOSTER WHEELER, DILLINGHAM demolished the heat exchangers and furnaces, PERFORMANCE MECHANICAL (PMI), BAUGH, BECHTEL, and ALBAY CONSTRUCTION. Plaintiff recalls co-worker James Saathoff, c/o Brayton♦Purcell LLP Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
All Technical Engineering & Construction, Inc. Altec Box 867 El Sobrante, CA 94803	Chevron Oil Richmond, CA	Steamfitter	7/27/1983- 8/3/1983

Job Duties: Plaintiff recalls this was an extension of the de-wax area. Plaintiff replaced pipes and pipe supports. Plaintiff changed valves, gaskets, and bolts on pipelines. Plaintiff used GARLOCK and FLEXITALLIC gaskets and re-packed valves. Plaintiff recalls working near the following trades: laborers, insulators, carpenters, ironworkers, electricians, millwrights, and operating engineers. Plaintiff recalls co-worker James Saathoff, c/o Brayton♦Purcell LLP. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Pacific Mechanical Corp.	Tosco Oil Avon, CA	Steamfitter	8/4/1983- 8/10/1983

Job Duties: Plaintiff repaired a catcracker that was burned out. Plaintiff demolished pipelines, beams, and the catcracker. Plaintiff chipped fireproofing off of beams. Plaintiff worked near the following trades: boilermakers, laborers, carpenters, electricians, pipefitters, and steamfitters. Plaintiff recalls the following contractors were part of the demolition and performed the same duties he did: SWINERTON & WALBERG, EPIC INSTRUMENTS, FOSTER WHEELER, DILLINGHAM demolished the heat exchangers and furnaces, PERFORMANCE MECHANICAL (PMI), BAUGH, BECHTEL, and ALBAY CONSTRUCTION. Plaintiff recalls co-worker James Saathoff, c/o Brayton♦Purcell LLP Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Scott Co. of California Box 5555 San Leandro, CA 94577	Chevron Oil Richmond, CA	Steamfitter	8/11/1983- 10/9/1983

Job Duties: Plaintiff used GARLOCK and FLEXITALLIC gaskets. Plaintiff assisted a welder and handled LINCOLN 5P welding rods. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Bechtel, Inc. 50 Beale St. San Francisco, CA 94105	Chevron Oil Richmond, CA	Steamfitter	10/10/1983- 12/31/1983; 3/27/1984- 8/20/1984

Job Duties: Plaintiff recalls this was new construction. Plaintiff handled GARLOCK and FLEXITALLIC gaskets. Plaintiff assisted welders and handled LINCOLN 5P welding rods. Plaintiff worked on pipe supports, pipe racks, and pipes. Plaintiff recalls co-worker James Saathoff, c/o Brayton♦Purcell LLP, and Gene Gosney, deceased. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Bemac Refrigeration Co., Inc. 10866 Chandler, Box 996 N. Hollywood, CA 91603	General Motors Fremont, CA	Steamfitter	8/21/1984- 9/30/1984

Job Duties: Plaintiff assisted a welder and handled LINCOLN 5P welding rods. Plaintiff worked on brackets and pipe supports. Plaintiff replaced control valves and GARLOCK and FLEXITALLIC gaskets. Plaintiff worked around insulated pipes and disturbed them by stepping on them in the pipeway. Plaintiff recalls O.C. MCDONALD performing the same job duties. Plaintiff currently contends that he was exposed to asbestos during this employment.

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<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
O.C. McDonald, Inc. 1150 W. San Carlos St. San Jose, CA 95126	General Motors Fremont, CA	Steamfitter	10/1/1984- 10/15/1984

Job Duties: Plaintiff assisted a welder and handled LINCOLN 5P welding rods. Plaintiff worked on brackets and pipe supports. Plaintiff replaced control valves and GARLOCK and FLEXITALLIC gaskets. Plaintiff worked around insulated pipes and disturbed them by stepping on them in the pipeway. Plaintiff hooked the chillers and installed pipes with control valves. Plaintiff recalls O.C. MCDONALD performing the same job duties. Plaintiff recalls co-worker Russ Martin, address currently unknown. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Johnson Controls, Inc. c/o Corp. Payroll Box 591 Milwaukee, WI 53201	Chevron Chemical Richmond, CA	Steamfitter	10/16/1984- 10/25/1984

Job Duties: Plaintiff removed control valves from the refining unit. Plaintiff scraped gaskets off and installed FLEXITALLIC and GARLOCK gaskets. Plaintiff pulled packing out and re-packed valves (i.e. control) with ANCHOR PACKING packing. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Foley-PMI Inc. 5440 Cherokee Ave. Alexandria, VA 22312	Shell Oil Martinez, CA	Steamfitter	10/26/1984- 11/5/1984

Job Duties: Plaintiff assisted a welder and handled LINCOLN 5P welding rods. Plaintiff used FLEXITALLIC gaskets. Plaintiff replaced sections of pipes. Plaintiff removed insulation on pipes when performing flange work. Plaintiff currently contends that he was exposed to asbestos during this employment.

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<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Scott Co. of California	General Motors Fremont, CA	Steamfitter	11/6/1984- 11/9/1984

Job Duties: Plaintiff assisted a welder and handled LINCOLN 5P welding rods. Plaintiff used GARLOCK and FLEXITALLIC gaskets. Plaintiff recalls O.C. MCDONALD employees performing pipe related work. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Sam P. Wallace Co., Inc. 2102 Empire Central Box 35828 Dalla, TX 75235	Water Treatment Plant Oakland, CA	Steamfitter	11/10/1984- 12/3/1984

Job Duties: Plaintiff recalls this was both remodel work and new construction of the plant. Plaintiff replaced and added pipes. Plaintiff assisted a welder and handled LINCOLN 5P welding rods. Plaintiff used GARLOCK and FLEXITALLIC gaskets. Plaintiff removed insulation around the flange areas. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Foley-PMI Inc. 5440 Cherokee Ave. Alexandria, VA 22312	Dow Chemical Pittsburg, CA	Steamfitter	12/4/1984- 12/31/1984

Job Duties: Plaintiff recalls this was a shutdown. Plaintiff replaced pipes, gaskets, and bolts. Plaintiff ground with a MILWAUKEE grinder. Plaintiff assisted a welder and handled LINCOLN 5P welding rods. Plaintiff used GARLOCK and FLEXITALLIC gaskets. Plaintiff currently contends that he was exposed to asbestos during this employment.

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<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Vann Engineering Corp. Kendall, John 618 Julpun Loop Clayton, CA 94517	high rise building next to Kaiser Plaza Oakland, CA	Steamfitter	2/12/1985- 10/8/1985

Job Duties: Plaintiff installed pipes for heaters and ventilation systems. In the machine room, plaintiff installed gaskets and assembled pipes for the heating and ventilation systems and water circulation. Plaintiff assisted welder and handled LINCOLN 5P welding rods. Plaintiff recalls others sprayed fireproofing on the beams in his presence. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Underground Construction Co., Inc. 5145 Industrial Way Benicia, CA 94510	Pipeline Highway 175 Unknown city, CA	Steamfitter	10/9/1985- 10/16/1985

Job Duties: Plaintiff assisted a welder and handled LINCOLN 5P welding rods. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Oil Field Construction Co., Inc. Box 1710 Tulsa, OK 74101	Union Oil Rodeo/Oleum, CA	Steamfitter	10/17/1985- 12/31/1985

Job Duties: Plaintiff recalls this was a shutdown job. Plaintiff worked on a coker. Plaintiff replaced gaskets with FLEXITALLIC and GARLOCK gaskets and changed pipes and valves. Plaintiff assisted a welder and handled LINCOLN 5P welding rods. Plaintiff currently contends that he was exposed to asbestos during this employment.

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<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
CWCO, Inc. Box 1761 Abilene, TX 79604	CWCO, Inc. Unknown location	Steamfitter	1986

Job Duties: Plaintiff is currently unable to recall the specifics of this employment. Plaintiff is currently unaware if he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Guy F. Atkinson Co. 1009 Oak Hill Rd., #201 LaFayette, CA 94549	Guy F. Atkinson Co. Unknown location	Steamfitter	1986

Job Duties: Plaintiff is currently unable to recall the specifics of this employment. Plaintiff is currently unaware if he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Brock & Blevin Engineering	U.S. Steel Pittsburg, CA	Steamfitter	1/13/1986- 4/7/1986

Job Duties: Plaintiff installed new valves and tightened packing. Plaintiff worked with bolt ups. Plaintiff assisted a welder and handled LINCOLN 5P welding rods. Plaintiff used GARLOCK and FLEXITALLIC gaskets. Plaintiff recalls supervisor Bill Blalock, address currently unknown Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Rosendahl Industrial Maintenance 1975 Mandeville Canyon Rd. Los Angeles, CA 90049	Union Oil Rodeo/Oleum, CA	Steamfitter	4/8/1986- 4/20/1986

Job Duties: Plaintiff recalls this was a shutdown. Plaintiff worked on a coker. Plaintiff assisted a welder and handled LINCOLN 5P welding rods. Plaintiff used GARLOCK and FLEXITALLIC gaskets. Plaintiff ground welds. Plaintiff currently contends that he was exposed to asbestos during this employment.



<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Dillingham Construction 1020 Serpentine Lane, #110 Pleasanton, CA 94566	Shell Oil Martinez, CA	Steamfitter	4/21/1986- 5/2/1986; 5/3/1986- 7/20/1986

Job Duties: Plaintiff worked on a shutdown in the L.O.P. Plant. Plaintiff removed insulation from bolts on the flanges. Plaintiff replaced valves and control valves. Plaintiff tightened packing in the valves and used GARLOCK and FLEXITALLIC gaskets. Plaintiff recalls being near PLANT INSULATION insulators removing, replacing and patching insulation. Plaintiff was also in close proximity to TIMEC, ALBAY, PERFORMANCE MECHANICAL INC. (PMI), and PACIFIC MECHANICAL CORP. (PMC) employees who were performing the same job duties that he was. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Foster Wheeler Energy Corp. Perryville Corporate Park Clinton, NJ 08809	Tosco Oil Avon, CA	Steamfitter	7/21/1986- 12/15/1986

Job Duties: Plaintiff recalls this was a new construction of the co-gen plant. Plaintiff worked with FLEXITALLIC and GARLOCK gaskets. Plaintiff installed pipes. Plaintiff assisted a welder and handled LINCOLN 5P welding rods. Plaintiff recalls the following co-workers: Hobby Green, c/o Brayton♦Purcell LLP; James Saathoff, c/o Brayton♦Purcell LLP; and welder Mike Verramonte, address currently unknown. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Dillingham Construction 1020 Serpentine Lane, #110 Pleasanton, CA 94566	Tosco Oil Avon, CA	Steamfitter	12/16/1986-1987

Job Duties: Plaintiff worked on the alkaline unit. Plaintiff replaced FLEXITALLIC and GARLOCK gaskets. Plaintiff performed blinding work. Plaintiff removed insulation from the insulated pipes around the bolt and flange areas. Plaintiff worked near PLANT INSULATION insulators who were removing and applying insulation. Plaintiff currently contends that he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
O.C. McDonald	Dreyers Ice Cream 2150 Whipple Avenue Union City, CA	Steamfitter	12/14/1988- 12/31/1988

Job Duties: Plaintiff's investigation and discovery are continuing. Plaintiff is currently unaware if he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Gibson Hart Company 700 Mulberry Street Kansas City, MO	Gibson Hart Company Unknown location	Steamfitter	1989

Job Duties: Plaintiff's investigation and discovery are continuing. Plaintiff is currently unaware if he was exposed to asbestos during this employment.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Dillingham Construction 1020 Serpentine Lane, #110 Pleasanton, CA 94566	Shell Oil Martinez, CA	Steamfitter	1/10/1989- 3/7/1989

Job Duties: Plaintiff's investigation and discovery are continuing.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Dillingham Construction 1020 Serpentine Lane, #110 Pleasanton, CA 94566	Tosco Oil Avon, CA	Steamfitter	3/8/1989- 3/20/1989

Job Duties: Plaintiff's investigation and discovery are continuing.

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<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
OFCCO Acquisition Corp. OFCCO Constructors Inc. 2737 Raymond Ave. Long Beach, CA	3600 Alameda Oakland, CA	Steamfitter	3/21/1989- 12/31/1989

Job Duties: Plaintiff's investigation and discovery are continuing.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Performance Mechanical Inc. PO Box 1516 Pittsburg, CA	U.S. Steel Loveridge Road Pittsburg, CA	Steamfitter	8/1/1990-9/3/1990

Job Duties: Plaintiff's investigation and discovery are continuing.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Bechtel Construction Co. 50 Beale Street San Francisco, CA	Chevron Oil Richmond, CA	Steamfitter	9/4/1990-1/9/1991

Job Duties: Plaintiff's investigation and discovery are continuing.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Dillingham Construction 1020 Serpentine Lane, #110 Pleasanton, CA 94566	Tosco Oil Avon, CA	Steamfitter	1/10/1991- 8/14/1991

Job Duties: Plaintiff's investigation and discovery are continuing.

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<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Performance Mechanical Inc. PO Box 1516 Pittsburg, CA	U.S. Steel Loveridge Road Pittsburg, CA	Steamfitter	8/15/1991- 9/4/1991; 9/12/1991- 9/22/1991; 9/26/1991- 11/19/1991

Job Duties: Plaintiff's investigation and discovery are continuing.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Swinerton Builders 1 Kaiser Plaza, #701 Oakland, CA 94612	Gaylord Plant Paper Mill Antioch, CA	Steamfitter	9/5/1991- 9/11/1991; 9/23/1991- 9/25/1991

Job Duties: Plaintiff's investigation and discovery are continuing.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Bechtel Construction Co. 50 Beale Street San Francisco, CA	Chevron Oil Richmond, CA	Steamfitter	11/20/1991-1992

Job Duties: Plaintiff's investigation and discovery are continuing.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
H-Industrial Construction Services, Ltd. PO Box 1500 Manchaca, TX	Readrite 441 Osgood Fremont, CA	Steamfitter	9/3/1993-12/1993

Job Duties: Plaintiff's investigation and discovery are continuing.

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<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Kinetic Systems Inc. 33225 Western Avenue Union City, CA	Lam Research 4400 Cushing Road Fremont, CA	Steamfitter	3/2/1995-12/1995

Job Duties: Plaintiff's investigation and discovery are continuing.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
ACCO	Lam Research 4400 Cushing Road Fremont, CA	Steamfitter	1/22/1996- 6/2/1996

Job Duties: Plaintiff's investigation and discovery are continuing.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Bechtel Capital Management Corporation, 50 Beale Street San Francisco, CA	Shell Oil Martinez, CA	Steamfitter	6/3/1996-12/1996

Job Duties: Plaintiff's investigation and discovery are continuing.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Performance Mechanical Inc.	Tosco Oil Avon, CA	Steamfitter	11/5/1998- 11/29/1998

Job Duties: Plaintiff's investigation and discovery are continuing.

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<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Performance Mechanical Inc.	U.S. Steel Loveridge Road Pittsburg, CA	Steamfitter	11/30/1998- 12/1998

Job Duties: Plaintiff's investigation and discovery are continuing.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Baugh	Tosco Oil Avon, CA	Steamfitter	1/13/1999- 12/1999

Job Duties: Plaintiff's investigation and discovery are continuing.